



DLA Piper LLP (US)
1251 Avenue of the Americas
27th Floor
New York, New York 10020-1104
www.dlapiper.com

Jessica Ann Masella
jessica.masella@us.dlapiper.com
T 212.335.4829

June 13, 2023

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Yanez Aguilar & Valencia Perez (1:22-cr-669-JPC)

Dear Judge Cronan:

I write, as counsel to Jose Manuel Yanez Aguilar, to respectfully request an adjournment of the status conference in the above-captioned matter currently scheduled for June 14, 2023. The Government has consented to this adjournment. The parties have conferred and are available on June 28, 2023. The reason for the requested adjournment is that there has been some delay in the parties' ability to provide Mr. Aguilar with certain discovery materials (he is currently detained at the MDC). The additional time will allow counsel to review the materials with Mr. Aguilar.

The Government also requests, with the consent of defense counsel for Mr. Yanez Aguilar, that the Court exclude time through the next-scheduled conference under the Speedy Trial Act. Such an exclusion would be in the interests of justice as it would allow the parties time to continue discussions concerning pretrial dispositions of this matter. *See* 18 U.S.C. § 3161(h)(7)(A).

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jessica A. Masella
Jessica A. Masella
DLA Piper LLP (US)
(212) 335-4829

The request is granted. The status conference as to Defendant Aguilar is adjourned to June 28, 2023, at 12:00 p.m. in Courtroom 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007. The Court will exclude time until June 28, 2023 under the Speedy Trial Act for the purposes of allowing the defense to review discovery and contemplate any pretrial motions. The Court finds that the ends of justice served by that exclusion outweigh the best interest of the public and the Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED.

June 13, 2023
New York, New York

A handwritten signature in black ink, appearing to read 'John P. Cronan', written over a horizontal line.

JOHN P. CRONAN
United States District Judge